



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2023 Grand Jury

UNITED STATES OF AMERICA,

CR No. 2:23-cr-00468-TJH

Plaintiff,

I N D I C T M E N T

v.

SAMVEL GRIGORYAN,
aka "Sim," and
HAYK MARTIROSYAN,

[18 U.S.C. § 371: Conspiracy to
Operate an Unlicensed Money
Transmitting Business; 18 U.S.C.
§§ 1960(a), (b) (1) (A), (B):
Operating an Unlicensed Money
Transmitting Business; 18 U.S.C.
§ 2(a): Aiding and Abetting; 18
U.S.C. §§ 981(a)(1)(C), 982, and
28 U.S.C. § 2461(c): Criminal
Forfeiture]

Defendants.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

[ALL DEFENDANTS]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown, but no later than December 2021, and continuing until on or about September 11, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendants SAMVEL GRIGORYAN, also known as "Sim," and HAYK MARTIROSYAN, and others known and unknown to the Grand Jury,

1 conspired and agreed with each other to knowingly and intentionally
2 operate an unlicensed money transmitting business affecting
3 interstate and foreign commerce, in violation of Title 18, United
4 States Code, Sections 1960(a), (b)(1)(A), (B).

5 B. MANNER AND MEANS OF THE CONSPIRACY

6 The object of the conspiracy was to be accomplished, in
7 substance, as follows:

8 1. Defendant GRIGORYAN would operate a money exchange business
9 that advertised, in part, on the website "coinexchange.am," wherein
10 he would offer to buy or sell cryptocurrency and would provide, in
11 exchange, cash less a commission fee.

12 2. Defendants GRIGORYAN and MARTIROSYAN and others would meet
13 with customers in Los Angeles County and elsewhere to take possession
14 of cash from customers or to provide cash to customers.

15 3. Defendant MARTIROSYAN would count cash.

16 4. Defendant MARTIROSYAN would transport cash.

17 5. Defendant GRIGORYAN would control and operate
18 cryptocurrency wallets through which he would send cryptocurrency to
19 or accept cryptocurrency from customers.

20 C. OVERT ACTS

21 On or about the following dates, in furtherance of the
22 conspiracy and to accomplish its object, defendants GRIGORYAN and
23 MARTIROSYAN, and others known and unknown to the Grand Jury,
24 committed the following overt acts, among others, within the Central
25 District of California and elsewhere:

26 Overt Act No. 1: On August 24, 2023, in Glendale, California,
27 defendant GRIGORYAN and an unidentified man ("UM-1") conducted a
28 \$40,000 money exchange (cash for cryptocurrency) for a 5% commission

1 fee with an individual who, unbeknownst to defendant GRIGORYAN, was a
2 confidential source working for law enforcement ("CS").

3 Overt Act No. 2: On August 24, 2023, while conducting the
4 money exchange with CS, UM-1 left the meeting location, picked up
5 defendant MARTIROSYAN, and both went back to the meeting location.

6 Overt Act No. 3: On August 24, 2023, while conducting the
7 money exchange with CS, defendant GRIGORYAN introduced CS to
8 defendant MARTIROSYAN, and defendant MARTIROSYAN conversed with CS
9 for the purpose of building a relationship with CS for future money
10 exchange transactions.

11 Overt Act No. 4: On August 28, 2023, in Glendale, California,
12 defendants GRIGORYAN and MARTIROSYAN conducted a \$60,000 money
13 exchange (cash for cryptocurrency) for a 5% commission fee with CS.

14 Overt Act No. 5: On September 6, 2023, in Glendale,
15 California, defendants GRIGORYAN and MARTIROSYAN conducted a \$40,000
16 money exchange (cash for cryptocurrency) for a 5% commission fee with
17 CS.

18 Overt Act No. 6: On September 6, 2023, while conducting the
19 money exchange with CS, defendant MARTIROSYAN took possession of
20 \$40,000 that CS provided, left the meeting location, drove to a
21 residence in Glendale, California, went inside for approximately six
22 minutes, and then left and drove to a financial institution.

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1 COUNT TWO

2 [18 U.S.C. §§ 1960(a), (b)(1)(A), (B); 18 U.S.C. § 2(a)]

3 [ALL DEFENDANTS]

4 Beginning on a date unknown, but no later than December 2021,
5 and continuing until on or about September 11, 2023, in Los Angeles
6 County, within the Central District of California, and elsewhere,
7 defendants SAMVEL GRIGORYAN, aka "Sim," and HAYK MARTIROSYAN, and
8 others known and unknown to the Grand Jury, each aiding and abetting
9 the other, knowingly conducted, controlled, managed, supervised,
10 directed, and owned an unlicensed money transmitting business
11 affecting interstate and foreign commerce, namely, a virtual currency
12 exchange business, that: (1) operated without an appropriate money
13 transmitting license in California, where such operation is
14 punishable as a felony under state law; and (2) failed
15 to comply with the money transmitting business registration
16 requirements under Section 5330 of Title 31, United States Code, and
17 the regulations thereunder.

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1 FORFEITURE ALLEGATION ONE

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 981(a)(1)(C) and Title 28, United States
7 Code, Section 2461(c), in the event of any defendant's conviction of
8 the offense set forth in Count One of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

11 (a) all right, title, and interest in any and all
12 property, real or personal, constituting, or derived from, any
13 proceeds traceable to the offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c), any
19 defendant so convicted shall forfeit substitute property, up to the
20 value of the property described in the preceding paragraph if, as the
21 result of any act or omission of said defendant, the property
22 described in the preceding paragraph or any portion thereof

23 (a) cannot be located upon the exercise of due diligence; (b) has
24 been transferred, sold to, or deposited with a third party; (c) has
25 been placed beyond the jurisdiction of the court; (d) has been
26 substantially diminished in value; or (e) has been commingled with
27 other property that cannot be divided without difficulty.

1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 982]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States will seek
5 forfeiture as part of any sentence, pursuant to Title 18, United
6 States Code, Section 982(a)(1), in the event of any defendant's
7 conviction of the offense set forth in Count Two of this Indictment.

8 2. Any defendant so convicted shall forfeit to the United
9 States of America the following:

10 (a) Any property, real or personal, involved in such
11 offense, and any property traceable to such property; and

12 (b) To the extent such property is not available for
13 forfeiture, a sum of money equal to the total value of the property
14 described in subparagraph (a).

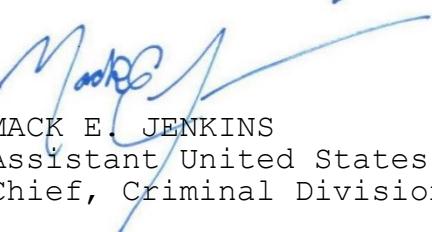
15 3. Pursuant to Title 21, United States Code, Section 853(p), as
16 incorporated by Title 18, United States Code, Section 982(b)(1), and
17 Title 18, United States Code, Section 982(b)(2), any defendant so
18 convicted shall forfeit substitute property, if, by any act or
19 omission of the defendant, the property described in the preceding
20 paragraph, or any portion thereof: (a) cannot be located upon the
21 exercise of due diligence; (b) has been transferred, sold to, or
22 deposited with a third party; (c) has been placed beyond the
23 jurisdiction of the court; (d) has been substantially diminished in
24 value; or (e) has been commingled with other property that cannot be
25 divided without difficulty. Substitution of assets shall not be
26 ordered, however, where the convicted defendant acted merely as an
27 intermediary who handled but did not retain the property in the
28 course of the money laundering offense unless the defendant, in

1 committing the offense or offenses giving rise to the forfeiture,
2 conducted three or more separate transactions involving a total of
3 \$100,000.00 or more in any twelve-month period.

4 A TRUE BILL
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6 /s/
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9 United States Attorney
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11 
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